

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE  
ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;  
UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**PLAINTIFF'S EMERGENCY MOTION TO HOLD DECISIONS ON PENDING MOTIONS  
RELATED TO THE MOTION TO AMEND THE COMPLAINT UNTIL AFTER THE 5-31-  
24 HEARING**

1. I the plaintiff hereby submit this emergency motion requesting that the court holds any decision on certain pending motions discussed at the 5-24-24 hearing, including the motion for discovery, the motion to strike, the motion for sanctions and the motion to stay. Grounds are as follows.
2. The court held a hearing on 5-24-24, and then extended the hearing to be completed on 5-31-24.
3. During the 5-24-24 hearing, the court allowed discussion of the motion for discovery, the motion to strike and the motions for sanctions as well as a motion to stay and a motion to reconsider the court's 5-6-24 striking of corrected replies.
4. The court instructed that the motion to amend the complaint and the motion for reasonable accommodations, will be discussed at the 5-31-24 hearing.
5. Based on my question to the court during the 5-24-24 hearing, the court also instructed me to file any supporting exhibits via an exhibit list and via normal e-filing after the hearing, rather than by real time email to the court during the hearing.
6. Also, the court previously set a deadline for my filing of replies to the defendants' objections to the motion for discovery and motions for sanctions, until 6-3-24. I have not yet filed such replies.
7. Also, regarding the motion to strike and the motion to stay (filed on 5-23-24 and 5-24-24 respectively), the defendants have not yet filed any responses thereto<sup>1</sup>. NB: The normal timeline for response lands on or about 6-6-24 for the motion to strike and 6-7-24 for the motion to stay.

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<sup>1</sup> During the 5-24-24 hearing, counsel for the Hilliard defendants stated that he had not yet had a chance to speak to Mr. Hilliard about the factual assertions in the motion to stay. I assume that once he has a chance to do so, he will likely file a response to the factual assertions in the motion to stay, etc.

8. In light of all of the above, I request that the court holds any decisions on the pending motions noted above in paragraph 1, until, at the very least, after the 5-31-24 hearing or until after the court's 6-3-24 deadline. This does not include the motion to reconsider striking and the motion on procedural matters of the hearing, which I am fine with the court ruling on before the 5-31-24 hearing. Thus, I am asking the court to hold all other motions because I have not yet had a chance to submit the supporting exhibit list and I have not yet had a chance to complete and file my replies that are due on 6-3-24, all of which I hope to try file this week.
9. NB: For example, the court granted the plaintiff until 6-3-24 to file the replies to the defendants' objections to discovery on the motion to amend the complaint. Logically, the court should not decide the motion for discovery until I have filed a reply to the objections to the motion for discovery. Same for the motions for sanctions.
10. Similarly, the court indicated that I could file an exhibit list in support of my statements made at the 5-24-24 hearing. Logically, the court also should not decide these motions until I have had a chance to file the exhibit list.
11. This is a reasonable request under the circumstances. It is a relatively simple administrative request that does not address any substantive issues.
12. This is styled as an emergency because the court indicated in the hearing that it may or may not wait to issue rulings on certain motions. Because I am not clear on what the court meant or which ones it meant, then it is urgent that I now make this request clear based on the above reasonable grounds so that the court can take this into consideration before taking action on any of the pending motions.
13. Also, because I am filing this first thing on Tuesday morning after the Memorial holiday, I did not have time to seek or await concurrence from the defendants. I believe I could be prejudiced if I wait any to file this motion given the circumstances of just coming off the long holiday weekend, which is immediately after the 5-24-24 hearing that conclude at around the close of business on Friday evening.

14. WHEREFORE, I respectfully request that this Court grants the relief requested or grant any other relief  
the Court deems proper

May 28, 2024

Respectfully submitted,  
/s/Andre Bisasor  
Plaintiff Andre Bisasor

**CERTIFICATE OF SERVICE**

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor  
Andre Bisasor